## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS

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UNITED STATES OF AMERICA, ex rel.

ANTONI MUHAWI,

Plaintiff,

v.

Case No.: 18-CV-02022 Hon. Manish S. Shah

PANGEA EQUITY PARTNERS, PANGEA EQUITY PARTNERS, LP, PANGEA EQUITY PARTNERS II, LP, PANGEA PROPERTIES, PANGEA VENTURES, LLC, PANGEA REAL ESTATE, and PANGEA REAL ESTATE HOLDINGS, LLC,

Defendants.

## **DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS**

Defendants Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate and Pangea Real Estate Holdings, LLC (collectively, the "Pangea Defendants"), pursuant to Federal Rule of Civil Procedure 12(c), move for judgment on the pleadings as to Plaintiff-Relator Antoni Muhawi's Third Amended Complaint. In support of their Motion, the Pangea Defendants submit their accompanying Memorandum of Law.

Pursuant to Judge Shah's Motion Practice case procedures, the parties conferred on this Motion prior to its filing. Plaintiff-Relator objects to this Motion.

WHEREFORE, the Pangea Defendants respectfully request that this Court grant their motion and grant such further relief as the Court deems just and proper.

Dated: November 19, 2024 Respectfully submitted,

**HOLLAND & KNIGHT LLP** 

Attorneys for Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate and Pangea Real Estate Holdings, LLC

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